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EMERGENCY COMMUNICATIONS DEPARTMENT

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June 11, 2013

Marlene H. Dortch

Office of the Secretary

Federal Communications Commission

445 12th Street, SW

Washington, D.C. 20554

Re: Response to Non-Initialized Phone Problems: Docket No. 08-51/09-14

Dear Ms. Dortch:

Ken Pitts and I have prepared and now submit the attached document, "Analysis of Non-Service Initialized (NSI) Cellular Calls to 911 in Massachusetts", which presents an analysis of 18 months of non-service initialized (NSI) 911 calls received by our state's wireless PSAPs.

We believe this analysis of over 400,000 NSI calls sheds new light on the nature and frequency of these calls and, in particular, the huge disparity in NSI calls by carrier.

We urge the Commission and its staff to use these findings as it assists the 911 community and the citizens of our country in finding ways to vastly reduce the negative impact that NSI calls have on our 911 system.

Regards,

George L. Fosque
911 and Communications Director